From: drupal_admin <drupal_admin@epa.gov>
Sent: Tuesday, September 06, 2016 7:52 PM
To: HarborComments
Subject: Harbor Comments

Submitted on 09/06/2016 9:52PM
Submitted values are:

Your Name: (b) (6) Your Comments:
Dear EPA,
The technology assignment flow charts (Figure 3.8) are important adaptive management tools that allow for new data to be considered in the final determination of active and passive remedial areas and depths. These figures should be clear, transparent, simple, correct, and adequately flexible such that empirical data/performance can "over-ride" the assumptions (similar to the Lower Duwamish Waterway Superfund Site). I believe the technology assignment flowcharts presented in the June 2016 FS have two errors and should be corrected:

1) In Figure 3.8-1b (PP Figure 10b), Technology Assignments for Intermediate Areas, the final decision diamond in the matrix designation column says “Designated Engineering Cap”. However, there are no capping options branching from the decision diamond into the technology assignment column; the only options are broadcast GAC, EMNR, and MNR. Is this matrix designation decision diamond correct? Should it instead say EMNR? Is this diamond needed at all?

2) In FS Figure 3.8-1c (PP Figure 10c), Technology Assignments for Shallow Areas, the second decision diamond in the depth of contamination column says “PTW – NRC / NAPL < 3ft”. The yes branch says “Dredge to 3ft / Reactive Engineered Cap + Beach Mix”, and the no branch says “Dredge to PTW NRC / Reactive Residual Layer + Backfill + Beach Mix”. We believe this is incorrect; should it instead say ““PTW – NRC / NAPL > 3ft” based on the resulting technology assignments? It would be partial dredge/cap for deeper contamination.

I recommend that the "matrix designation" criteria for each technology be added to these tables for clarity/completeness (similar to Duwamish). In addition, existing bathymetry and clearance requirements in the navigation channel areas should be added to Figure 10a with acknowledge of present versus potential future navigation needs.

See PCI comment submittal package and the Sustainability Analysis Report (AECOM 2016) for additional comments that we support.